

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

JOHN ANTHONY GENTRY, sui juris/pro se	)	
	)	
Plaintiff,	)	
vs.	)	
	)	
THE STATE OF TENNESSEE; PAMELA	)	CASE NO. 3:17-0020
ANDERSON TAYLOR; BRENTON HALL	)	
LANKFORD; SARAH RICHTER PERKY;	)	JURY TRIAL DEMANDED(12)
UNNAMED LIABILITY INSURANCE	)	
CARRIER(S); et al.	)	
	)	
Defendants.	)	

**OBJECTION TO PLAINTIFF’S MOTION FOR REVIEW**

Come now, Defendants Pamela Taylor and Brenton Lankford (collectively, “Defendants”), and object to Plaintiff’s Motion for Review of Magistrate’s Order Dated April 26, 2017 and Motion for Extension of Time or in the Alternative Motion for Leave to Amend (DE # 56, the “Motion for Review”).

Defendants join in the well-reasoned argument field by Defendant Sarah Perky in opposition to the Motion for Review.

Defendants further state that not only has Plaintiff filed three complaints in this action, two of them making allegations against Defendants, he also filed a complaint in the Davidson County Circuit Court against Defendants. Plaintiff has had ample opportunity to make his allegations against Defendants without the necessity of a Third Amended Complaint.

Defendants’ Motion to Dismiss the Second Amended Complaint in this action (DE # 45) is fully briefed and pending before the Court. Justice does not require the Court to permit Plaintiff to file a Third Amended Complaint. Rather, justice requires that the Court deny Plaintiff’s request, such that the Court may rule on Defendants’ Motion to Dismiss without

further briefing.

WHEREFORE, Defendants, by and through their undersigned attorneys, respectfully request that this Court adopt the ruling of the Magistrate as set forth in her Order (DE # 55), denying Plaintiff's request to file a third amended complaint and ordering that the pending motions to dismiss will be decided upon the pleadings that are already before the Court.

Respectfully submitted,

s/ Erika R. Barnes

Erika R. Barnes (BPR #028628)  
Lauren Paxton Roberts (BPR #025049)  
STITES & HARBISON PLLC  
401 Commerce Street, Suite 800  
Nashville, TN 37219  
Telephone: (615) 782-2252  
Fax: (615) 742-0734  
e-mail: [ebarnes@stites.com](mailto:ebarnes@stites.com)

*Counsel for Defendants Pamela Anderson Taylor  
and Brenton Hall Lankford*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 15<sup>th</sup> day of May, 2017, a true and correct copy of the foregoing document was filed electronically. Notice of this filing was sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's filing system. The filing was also served by electronic mail and first-class mail, postage pre-paid, upon:

John Anthony Gentry  
208 Navajo Court  
Goodlettsville, TN 37072

s/ Erika R. Barnes

Erika R. Barnes